

Jeff Palmer
1101 4th Ave N
Grand Forks, ND 58203
jpalmer@aero.und.edu

June 4, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh St, SW
Nassif Building
Room PL-401
Washington, DC 20590-001

Docket Number FAA-2004-17041: Noise Stringency Increase for Single-Engine Propeller-Driven Small Aircraft.

This NPRM concerns the reduction of aircraft noise levels of single-engine propeller-driven aircraft, the proposed rule would involve a 3-6 decibel level reduction from the current standard for all new type certificates and STCs after November of 2004 for single engine aircraft. Although I feel that we must continually increase our standards and use of current technologies I do not feel that this NPRM addresses these concerns properly, or is even being drafted for the correct reasons.

Aviation as an industry must continually strive to be a “good neighbor” to all citizens to maintain its health and the good standing that it currently has in the United States. These “good neighbor” relations involve more than the addition of additional regulations; the addition of more unnecessary regulation, although not immediate, may begin to stifle the growth of aviation as it has in other countries. The FAA’s role is to increase safety and promote aviation within the United States but as the NPRM is currently drafted it appears to address the issue of trade between the Europe and the United States, to make U.S.-manufactured aircraft acceptable in Europe. Is this promoting aviation in the United States? If an aircraft manufacturer wishes to target markets outside of the United States they can manufacture the aircraft to the JAA standards. I do feel that there is room for regulation to continually utilize and improve production aircraft but the manner in which it is currently drafted may have unforeseen impacts on current owners and operators.

I am in support for the proposed reductions on new type certificates allowing for us to maintain our current level of use of available and proven technologies and to not digress from the point of utilization that we have attained. As noted in the NPRM all production aircraft currently meet these standards.

I do not feel that the noise reductions should be implemented for all STCs that are applied for following November 4, 2004. There are certain high performance aircraft that are utilized for specific purposes that may not be able to meet the new standards when an STC is desired. I wholeheartedly concur with the comments provided by Brian Meyer of

Hartzell Propeller Inc on this issue. An STC may be desired for a new propeller system on an aircraft that may decrease the noise level from the current setup but may still not meet the new standards that are set forth in the NPRM. This would discourage owners from making upgrades to equipment if age necessitated it or if a decrease in noise level was desired. STCs should be allowed, as Meyer pointed out, under a “no-acoustical-change” basis to lower the economic burden on the affected parties and allow for further innovation for noise reduction, even if it does not meet the proposed standards.

The rule should not be implemented merely to be in line with current JAA standards, it should be implemented to maintain our current use of proven and available technologies in production aircraft and to maintain current levels preventing any digression from where the industry is currently. Allowing STCs to operate under a “no-acoustical-change” basis would allow for further innovation and implementation of new technologies increasing safety, decreasing costs, and possibly reducing noise. Much of the noise problem could also be solved by pilot education concerning “public-friendly” operating procedures, a point that I continually reinforce to my students as an active CFI/CFII/MEI instructor at a large collegiate aviation program.

Sincerely,

Jeff Palmer